

Date: October 22, 2001
To: Jim Stefanoff
From: Mary Kay Voytilla
Re: Changes to Existing Tables and Figures for Inclusion in Mine Water ROD Amendment

Here are changes that I would like you to make to existing figures and tables from the RI/FS and the Proposed Plan so that I can include them in the ROD Amendment. Please let me know if anything is unclear.

1. I would like to have Figure 1 from the Proposed Plan blown-up to fit on an 8-1/2 x 11 inch page. I will use it as Figure 1 in the ROD Amendment. The orientation of the figure on the page should be opposite of what it is in the Proposed Plan (i.e., the long side of the figure should fit across the 11 inch side of the page). The title and figure number should remain the same (i.e., Figure 1, Vicinity of the Bunker Hill Mine).
2. I would like to have Figure 2 from the Proposed Plan blown-up to fit on an 8-1/2 x 11 inch page. I will use it as Figure 2 in the ROD Amendment. The orientation of the figure on the page should be opposite of what it is in the Proposed Plan (i.e., the long side of the figure should fit across the 11 inch side of the page). The title and figure number should remain the same (i.e., Figure 2, Bunker Hill Mine Area).
3. I would like to have Figure 3 from the Proposed Plan blown-up to fit on an 8-1/2 x 11 inch page. I will use it as Figure 3 in the ROD Amendment. The orientation of the figure on the page should be opposite of what it is in the Proposed Plan (i.e., the long side of the figure should fit across the 11 inch side of the page). The title and figure number should remain the same (i.e., Figure 3, General Flow Model).
4. I would like to have Table 2-7 of the RI/FS revised as Table 2 for the ROD Amendment. Change the title to Table 2. Remove the word "Potential" from the title. Remove "Bunker Hill Mine Water RI/FS Report" from the title line. Remove the page number from the bottom of the page. Shouldn't the table of values at the bottom of Table 2-7 follow immediately after footnote 4? If so, please move.
5. I would like to have Table 2-8 of the RI/FS revised as Table 3 for the ROD Amendment. Change the title to Table 3. Remove the word "Potential" from the title. Remove "Bunker Hill Mine Water RI/FS Report" from the title line. Remove the page number from the bottom of the page. Update the cadmium criteria to be consistent with the new federal criteria for cadmium that we referenced in the June 2001 *Bunker Hill CTP Discharge Quality and Monitoring Plan*. Add a footnote to identify the source of the updated cadmium criteria (i.e., Water quality criteria per Federal Register/Volume 66, number 7 (April 12, 2001)). Jim, shouldn't there be a table of values after footnote 3 to show what numbers to use for m_A , b_A , m_C , and b_C , as well as the freshwater conversion factors? Is so, please include.

6. I would like to have Table 2-9 of the RI/FS revised as Table 4 for the ROD Amendment. Change the title to Table 4. Remove "Bunker Hill Mine Water RI/FS Report" from the title. Please include a footnote on the table to identify the source of the information (i.e., *Total Maximum Daily Load for Dissolved Cadmium, Dissolved Lead, and Dissolved Zinc in Surface Waters of the Coeur d'Alene River Basin, August 2000, Issued by the Environmental Protection Agency and Idaho Department of Environmental Quality*).
7. I would like to have Table 1 of the Proposed Plan revised as Table 5 for the ROD Amendment. Change the title to Table 5. Remove "Proposed Plan for the Bunker Hill Superfund Site" from the title line. Center the table on the page but keep the same orientation as in the Proposed Plan. Remove the page number at the bottom of the page.
8. I would like to have Table 2 of the Proposed Plan revised as Table 6 for the ROD Amendment. Change the title to Table 6. Remove "Proposed Plan for the Bunker Hill Superfund Site" from the title line. Center the table on the page but keep the same orientation as in the Proposed Plan. Remove the page number at the bottom of the page.
9. I would like to have Table 3 of the Proposed Plan revised as Table 7 for the ROD Amendment. Change the title to Table 7. Remove "Proposed Plan for the Bunker Hill Superfund Site" from the title line. Center the table on the page but keep the same orientation as in the Proposed Plan. Remove the page number at the bottom of the page.
10. I would like you to create a Table 8 for me for the ROD Amendment using the Alternative 3A Cost Summary included in Appendix G of the RI/FS (this is the first table in Appendix G after the blue divider page for Alternative 3 costs, it is titled "Cost Summary" for Alternative 3A Phased Mitigations/Treat (with CIA Sludge Disposal Beds) at interest rate = 7%). Please title the table: Table 8, Detailed Breakdown of Costs.
11. I would like you to create a Table 9 for me for the ROD Amendment using Table 2-5 from the RI/FS. Please revise to read "Table 9," remove the word "potential" from the table's title, and remove "Bunker Hill Mine Water RI/FS Report" from the title line. Revise page numbers to start at "1." Add "CTP - Central Treatment Plant" to the Notes section at the bottom of the page. For each of the entries on the table, revise the "Evaluation" column as noted below (everything else on the table should stay the same):

Federal Water Quality Standards - Relevant and appropriate for CTP effluent where it discharges into Bunker Creek.

Idaho Water Quality Standards and Wastewater Treatment Requirements - Applicable for CTP effluent where it discharges into Bunker Creek.

National Recommended Water Quality Criteria - Relevant and appropriate for CTP effluent where it discharges into Bunker Creek.

Total Maximum Daily Load - To Be Considered for CTP effluent where it discharges into Bunker Creek.

National Pollutant Discharge Elimination System Regulations - Applicable for CTP effluent where it discharges into Bunker Creek.

National Ambient Air Quality Standards - Relevant and appropriate site wide for disposal of sludge and construction activities conducted under the remedy.

Idaho Toxic Air Pollutants - Relevant and appropriate site wide for disposal of sludge and construction activities conducted under the remedy.

12. I would like you to create a Table 10 for me for the ROD Amendment using Table 2-11 from the RI/FS. Please revise to read "Table 10," remove the word "potential" from the table's title, and remove "Bunker Hill Mine Water RI/FS Report" from the title line. Revise page numbers to start at "1." Add "NMFS - National Marine Fisheries Service" to the Notes section at the bottom of the page. For each of the entries on the table, revise the "Evaluation" column as noted below (everything else on the table should stay the same):

National Historic Preservation Act - While the Bunker Hill Superfund site has not been designated as having historic value to warrant inclusion in the National Register of Historic Places, the Act is applicable if any eligible structures are encountered during the performance of remedial actions.

Native American Graves Protection - Applicable site wide for any cultural resources found during the performance of remedial actions.

Archaeological and Historical Preservation Act - Applicable site wide for any eligible historical and archaeological artifacts identified during the performance of remedial actions.

Archaeological Resources Protection Act - Applicable site wide for any eligible historical and archaeological artifacts identified during the performance of remedial actions.

Idaho Preservation of Historical Sites - Applicable site wide for any eligible structures identified during the performance of remedial actions.

Endangered Species Act - Applicable site wide for any endangered or threatened species or associated habitat identified during the performance of remedial actions. EPA has consulted with USFWS and NMFS. Gray wolves (nonessential experimental population) were the only listed threatened or endangered species with the probability of occurring in or transitioning through the project area. In a biological assessment, a determination was made of no effect to gray wolves.

Fish and Wildlife Conservation Act - Applicable site wide for remedial actions that may impact habitat for non-game fish and wildlife.

Fish and Wildlife Coordination Act - Applicable site wide for remedial actions that impact streams.

[In the write-up on Table 2-11 for this particular regulation, the last sentence in the "Summary of Requirement" column needs to be removed, i.e., please remove "Certain remedies may result in the temporary or permanent modification of naturally occurring water bodies and may require the construction of mitigated wetlands in other areas."]

Idaho Classification and Protection of Wildlife - Applicable site wide for any remedial action that may affect or take designated wildlife species.

Clean Water Act - Applicable site wide for construction activities including but not limited to road construction, treatment plant construction, and surface water diversions that could result in discharges to surface waters.

[In the write-up on Table 2-11 for this particular regulation, the last sentence in the "Summary of Requirement" column needs to be removed, i.e., please remove "Certain proposed alternatives may result in the constant submersion of metal-contaminated sediments."]

Protection of Floodplains - Applicable site wide for construction activities that occur within the 100-year floodplain.

Protection of Wetlands - While no wetlands have been identified by federal or state agencies in the project area, the Order is applicable site wide if wetlands are identified that are impacted by remedial actions.

13. I would like you to create a Table 11 for the ROD Amendment using Table 2-12 from the RI/FS. Please revise to read "Table 11," remove the word "potential" from the table's title, and remove "Bunker Hill Mine Water RI/FS Report" from the title line. Revise page numbers to start at "1." For each of the entries on the table, revise the "Evaluation" column as noted below (everything else on the table should stay the same):

RCRA Bevill Exemption - Applicable to AMD and sludge generated from treatment of AMD.

RCRA Subtitle C - Applicable to any hazardous waste (other than Bevill-exempted waste) generated as part of the treatment plant operation.

Idaho Rules and Standards for Hazardous Waste - Applicable to any hazardous waste (other than Bevill-exempted waste) generated as part of the treatment plant operation.

RCRA Subtitle D Part 257 Criteria for Classification of Solid Waste Disposal Facilities and Practices - Applicable for sludge disposal facilities constructed within the 21-square mile area.

RCRA Subtitle D Part 258 Criteria for Municipal Solid Waste Landfills - Relevant and appropriate for locating, designing, operating and closing sludge disposal facilities constructed within the 21-square mile area.

Idaho Solid Waste Management Rules and Standards - Applicable to the management and disposal of sludge generated by the treatment process.

Federal Department of Transportation Hazardous Materials Transportation Act - Applicable for the transportation of any hazardous materials on public thoroughfares.

Stormwater Discharge Under National Pollutant Discharge Elimination System - Applicable for any point source discharges of stormwater from remedial action construction areas to surface waters.

Idaho Non-Point Source Management - To be considered for site wide remedial activities that could result in non-point discharges to surface or groundwater.

Idaho Water Quality Standards and Wastewater Treatment Requirements - Applicable site wide for construction or human activities conducted that may result in discharges to surface water.

Federal Clean Air Act - Applicable site wide for disposal of sludge and construction activities conducted under the remedy.

Idaho Air Pollution Control Rules - Applicable site wide for disposal of sludge and construction activities conducted under the remedy.

Idaho Safety of Dams Rules - Applicable for activities involving the construction or alteration of a dam as a result of stream diversions conducted under this remedy.

Idaho Stream Channel Alteration - Applicable site wide for source control activities that involve the alteration of stream channels.

Disposal of Dredge Materials - Applicable site wide to any dredging and filling actions that occur as a result of implementing stream diversions under this remedy.

Idaho Land Remediation Rules - Relevant and appropriate for actions conducted under this remedy that result in remaining residual concentrations of chemicals in excess of regulatory levels.